

MEMO ENDORSED



March 14, 2024

Sent via ECF
The Honorable Edgardo Ramos
United States District Court Judge
Southern District of New York
Thurgood Marshall U.S. Court House
40 Foley Square, Court Room 619
New York, NY 10007

The motion deadline is extended to April 15, 2024. By that date, Plaintiffs shall either file the motion or submit a letter updating the Court on the status of judgment-debt discovery. The Clerk of Court is respectfully directed to terminate the motion, Doc. 183. SO ORDERED.

A handwritten signature in blue ink, appearing to read 'Edgardo Ramos'.

Edgardo Ramos, U.S.D.J.

Dated: March 15, 2024

New York, New York

Re: *Dector, et al. v. RCI PLBG, Inc., et al.*, Civil Action No. 17-cv-2269

Your Honor,

Judgment-Creditors in the above-captioned matter, by and through counsel, write the Court to request the Court stay the deadline for Judgment-Creditors to file their motion for successor liability, which is due on March 15, 2024. After months of not responding to judgment debt discovery and attempts to speak telephonically, Judgment-Debtors Robert Dimiceli answered undersigned counsel's telephone call on March 14, 2024, which telephone call was made in anticipation of filing a motion to compel responses. On the telephone call, Dimiceli indicated that he intends to respond to the requests. As such, Judgment-Creditors request that the Court stay the deadline for the motion for successor liability until Dimiceli responds to judgment-debt discovery or again ceases communicating. Should Dimiceli fail to meaningfully participate, Judgment-Creditors will seek to file a motion to compel responses.

Respectfully submitted,

SLATER SLATER SCHULMAN LLP

A handwritten signature in blue ink, appearing to read 'Geoffrey Kalender'.

Geoffrey A. Kalender, Esq.

cc: All counsel of record via ECF
Judgment-Debtor Robert Dimiceli via 1st Class Mail

www.sssfirms.com

NEW YORK

CALIFORNIA

NEW JERSEY

PENNSYLVANIA

LOUISIANA

ARKANSAS

NEW MEXICO

NORTH CAROLINA

445 Broad Hollow Road, Suite 419, Melville, NY 11747 | 631.420.9300